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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
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**RESCAP BORROWER CLAIMS TRUST'S COUNTER-
DESIGNATION OF ITEMS FOR RECORD ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure and Rule 8007-1 of the Local Bankruptcy Rules for the Southern District of New York, the ResCap Borrower Claims Trust (the “**Borrower Trust**”), established pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [Docket No. 6030] (the “**Plan**”)¹ in the above-captioned Chapter 11 cases (the “**Chapter 11 Cases**”), hereby submits, on behalf of Residential Capital,

¹ The Plan was confirmed by order of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) dated December 11, 2013 [Docket No. 6065] and the Plan’s effective date occurred on December 17, 2013. The Plan provides for the creation and implementation of the Borrower Trust. *See* Plan, Art. IV.F. The Plan further provides that the Borrower Claims Trustee is deemed the representative of the Debtors’ estates for the purpose of prosecuting objections to borrower claims, *see* Plan, Art. IV.S, and this
(cont'd)

LLC (“**ResCap**”) and its affiliated post-effective date debtors (collectively, the “**Debtors**”)² in the Chapter 11 Cases, the following counter-designation of additional items to be included in the record on appeal in connection with the Notice of Appeal [Docket No. 6659] filed by appellant Corla Jackson (“**Appellant**”), from the *Memorandum Opinion and Order Sustaining Objection and Expunging Claim No. 4443 by Corla Jackson* [Docket No. 6363], which was entered by the Bankruptcy Court on January 27, 2014.

The Borrower Trust designates the following additional items to be included in the record on appeal.³

A. Pleadings

Docket No.	Description
5100	Debtors’ Objection to Proof of Claim Filed by Corla Jackson (Claim No. 4443) (the “ Debtors’ Objection ”)
6363	Memorandum Opinion and Order Sustaining Objection and Expunging Claim No. 4443 by Corla Jackson
6487	Notice of Appeal by Corla Jackson
6518	Motion to Extend Time to File Designation of Items to be Included in Record on Appeal filed by Corla Jackson
6538	Order Granting Motion to Extend Time to File Designation of Items to be Included on Appeal
6659	Notice of Appeal by Corla Jackson
6660	Designation of Contents by Corla Jackson

(cont'd from previous page)

appeal arises from the Debtors’ objection to the allowance of the proof of claim filed by the Appellant in the Chapter 11 Cases.

² The names of the Debtors in the Chapter 11 Cases and their respective tax identification numbers are identified on Exhibit 1 to the *Affidavit of James Whitlinger, Chief Financial Officer of Residential Capital, LLC, in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 6].

³ For the avoidance of doubt, the Borrower Trust’s designation of any pleadings and/or exhibit lists includes the designation of any and all exhibits filed with, attached to, or otherwise referenced in such pleadings.

B. Transcripts⁴

Date/Time of Hearing	ECF No.	Type of Hearing	Court Reporter or Recorder	Copy Ordered By Debtors
11/15/2013 at 10:00 a.m.	5880	Omnibus Hearing Regarding, <i>inter alia</i> , Debtors' Objection to Proof of Claim Filed by Corla Jackson (Claim No. 4443)	eScribers, LLC	Yes

C. Other

Docket No.	Description
5100, Ex. 2-M	Proof of Claim Number 4443 filed by Corla Jackson on November 9, 2012

Dated: March 31, 2014
New York, New York

/s/ Norman S. Rosenbaum

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⁴ Pursuant to Local Bankruptcy Rule 8007-1(b), the transcript has not been filed as an exhibit due to its voluminous nature.